

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

DENISE CAMPBELL, on behalf of herself)
and those similarly situated,)
Plaintiff,)

v.)

CIVIL ACTION NO. B-09-197

IMMUNOSYN CORPORATION,)
ARGYLL BIOTECHNOLOGIES, LLC,)
JAMES T. MICELI, DOUGLAS A.)
MCCLAIN, JR, FRANK MORALES,)
ARGYLL EQUITIES, LLC,)
STEPHEN FERRONE, and DOUGLAS)
A. MCCLAIN, SR.,)
Defendants.)

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF HER MOTION TO COMPEL THE
PRODUCTION OF DOCUMENTS FROM DEFENDANT ARGYLL
BIOTECHNOLOGIES, LLC**

Plaintiff hereby submits this memorandum of law in support of her motion to compel the production of documents from Defendant Argyll Biotechnologies, LLC. Plaintiff served her First Request for Production of Documents on December 22, 2009. To date, no response has been received to said production request. The time to respond to said discovery requests has passed, without indication from the Defendant as to when a response and responsive documents are forthcoming.

Pursuant to F.R.C.P. 37(a)(2)(B), Plaintiff seeks an Order from this Court compelling responses to the subject discovery. Said discovery is relevant to the claims advanced and likely to lead to the discovery of admissible evidence.

CONCLUSION

Based on the foregoing, Plaintiffs respectfully request that this Honorable Court order the Defendant Argyll Biotechnologies, LLC to respond to and produce documents in response to the Plaintiffs' First Request for Production of Documents within fourteen (14) days of a ruling on the subject motion.

PLAINTIFF,
by her attorneys,

/s/ Andrew J. Tine

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CERTIFICATE OF SERVICE

I, Andrew J. Tine, hereby certify that I filed the foregoing electronically this 1st day of October 2010 using the ECF system for the Southern District of Texas and that all counsel of record will receive electronic notice of said filing.

/s/Andrew J. Tine